

LAW OFFICES OF JOSEPH A. MASSOOD
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Attorneys for: Elite Orthopedic & Sports Medicine

In re:

Stephen Bonsick,

Debtor(s)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CASE NUMBER: 09-20192 (DHS)

CONFIRMATION HEARING DATE
September 23, 2009

**OBJECTION TO CONFIRMATION
BY UNSECURED CREDITOR
ELITE ORTHOPEDIC & SPORTS MEDICINE**

Elite Orthopedic & Sports Medicine, an unsecured creditor of the debtor, objects to the debtor's plan for the following reasons:

1. The debtor listed Elite Orthopedic & Sports Medicine as a creditor. However, the debtor did not list the monies received by him from his health insurance company, Horizon Blue Cross/Blue Shield of NJ on or about April 10, 2008 in the amount of \$32,083.00. This check was to be signed over to Elite Orthopedic & Sports Medicine.
2. Debtor paid a personal check to Elite Orthopedic & Sports Medicine on or about April 25, 2008 in the amount of \$3,000. The remaining balance of the check, \$29,083.00 was never paid in fraudulently retained by debtor. The debtor has not indicated this amount anywhere in his Voluntary Petition.
3. Elite Orthopedic & Sports Medicine objects to the discharge of the entire debt owed and specifically, the \$29,083.00 received and fraudulently retained by debtor.
4. To resolve this issue, the plan should state that the claim of Elite Orthopedic & Sports Medicine is unaffected by the plan and will not be discharged upon completion of the plan.

/s/ Andrew R. Bronsnick

ANDREW R. BRONSNICK, attorney for Elite Orthopedic & Sports Medicine

Dated: September 10, 2009